

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY, SYLVIA  
DAY, JONATHAN FRANZEN, JOHN  
GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA ROBINSON,  
GEORGE SAUNDERS, SCOTT TUROW, and  
RACHEL VAIL, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,  
OPENAI GP LLC, OPENAI OPKO LLC,  
OPENAI GLOBAL LLC, OAI CORPORATION  
LLC, OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, and OPENAI STARTUP  
FUND MANAGEMENT LLC,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE LINDEN,  
DANIEL OKRENT, JULIAN SANCTON,  
HAMPTON SIDES, STACY SCHIFF, JAMES  
SHAPIRO, JIA TOLENTINO, and SIMON  
WINCHESTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

OPENAI INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPKO LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendants.

Case No.: 1:23-cv-08292-SHS

Case No.: 1:23-cv-10211-SHS

Case No.: 1:24-cv-00084-SHS

Hon. Sidney H. Stein

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

NICHOLAS A. BASBANES and NICHOLAS  
NGAGOYEANES (professionally known as  
Nicholas Gage), individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

MICROSOFT CORPORATION,  
OPENAI, INC., OPENAI GP, LLC,  
OPENAI HOLDINGS, LLC, OAI  
CORPORATION, LLC, OPENAI  
GLOBAL, LLC, OPENAI, LLC, and  
OPENAI OPCO LLC,

Defendants.

Pursuant to Rule 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Thomas E. Gorman, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-captioned action.

I am a member in good standing of the bar of the State of California, and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: April 26, 2024

By: /s/ Thomas E. Gorman

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Attorneys for Defendants OPENAI INC.,  
OPENAI LP, OPENAI LLC, OPENAI GP  
LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION LLC,  
OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, and OPENAI STARTUP  
FUND MANAGEMENT LLC